

TPL:mmp

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

00-6312 CR-ROETTGER
CASE NO.

18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)
18 U.S.C. § 2

MAGISTRATE JUDGE
SNOW

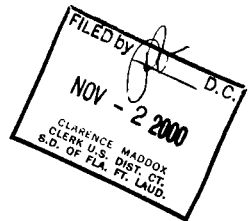
UNITED STATES OF AMERICA,

Plaintiff,

v.

JERMAINE C. WILLIAMS and
LOWEN ESPINUEVA,

Defendants.



INDICTMENT

The Grand Jury charges that:

COUNT I

1. At all times material to this indictment Brinks Armored Car Service, Inc. (hereinafter referred to as "Brinks" in this indictment) was an armored car courier corporation doing business in interstate and foreign commerce. Brinks engages in the daily business of obtaining, storing and transporting large amounts of United States currency and negotiable instruments in cities throughout the United States as well as in many other countries throughout the world.

2. From a date unknown to the Grand Jury but at least by on or about October 6, 2000, through on or about October 20, 2000, in Broward County, in the Southern District of Florida,

14 p's

the defendants,

**JERMAINE C. WILLIAMS and
LOWEN ESPINUEVA,**

did knowingly combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to unlawfully obstruct, delay and affect and attempt to obstruct, delay and affect, commerce as that term ^{IS IR} defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants JERMAINE C. WILLIAMS and LOWEN ESPINUEVA did unlawfully attempt to take and attempt to obtain personal property consisting of bank deposits belonging to Citibank, Inc., that were in the care of Eisham Ruiz and Frank Granja, Brinks employees, against their will by means of actual and threatened force and violence, in that the defendants ambushed and shot Eisham Ruiz and Frank Granja. All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT II

3. The first paragraph of Count 1 of this indictment is hereby incorporated as if fully set forth herein.

4. On or about October 20, 2000, in Broward County, in the Southern District of Florida, the defendants,

**JERMAINE C. WILLIAMS and
LOWEN ESPINUEVA,**

did knowingly obstruct, delay and affect and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of

articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants JERMAINE C. WILLIAMS and LOWEN ESPINUEVA did unlawfully attempt to take and attempt to obtain personal property consisting of bank deposits belonging to Citibank Inc. that were in the care of Eisham Ruiz and Frank Granja, Brinks employees, against their will by means of actual and threatened force and violence in that the defendants ambushed and shot Eisham Ruiz and Frank Granja. All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT III

5. On or about October 20, 2000, in Broward County, in the Southern District of Florida, the defendants,

JERMAINE C. WILLIAMS and LOWEN ESPINUEVA,


knowingly used and carried firearms, to wit, a Makarov 9MM semi-automatic pistol serial number F8539 and a Mossberg 12 guage shotgun, model number 500, serial number L825206, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit, conspiracy and attempted robbery, which resulted in serious bodily injury

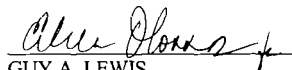
as set forth in Counts I and II of this Indictment, in violation of Title 18, United States Code,

Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL


FOREPERSON


GUY A. LEWIS
UNITED STATES ATTORNEY


THOMAS P. LANIGAN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

Jermaine C. Williams, and
Lowen Espinueva

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division: (Select One)

New Defendant(s) Yes ____ No ____
Number of New Defendants ____
Total number of counts ____X Miami ____ Key West
X FTL ____ WPB ____ FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

- Interpreter: (Yes or No) NO
List language and/or dialect _____

- This case will take 5 days for the parties to try.

- Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<u>X</u> _____	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u> _____
V	61 days and over	_____		

- Has this case been previously filed in this District Court? (Yes or No) NO

If yes:

Judge: _____

Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) YES

If yes:

Magistrate Case No. 00-4244

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of October 20, 2000

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) NO

- Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes X No ____ If yes, was it pending in the Central Region? Yes X No ____

- Did this case originate in the Narcotics Section, Miami? Yes X No ____

Thomas P. Lanigan
THOMAS P. LANIGAN
ASSISTANT UNITED STATES ATTORNEY
Court No. A550033

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JERMAINE C. WILLIAMS Case No.: _____

Count #: 1

18 U.S.C. § 1951(a) Hobbs Act Conspiracy

*Max. Penalty: Twenty (20) years' imprisonment and \$250,000 fine.
=====

Count #: 2 18 U.S.C. § 1951 Attempted Hobbs Act Robbery

*Max. Penalty: Twenty (20) years' imprisonment and \$250,000 fine
=====

Count #: 3 18 U.S.C. § 924(c)(1)(a) Use of firearm during
commission of crime of violence

*Max. Penalty: Ten (10) years' imprisonment (consecutive) and
\$250,000 fine
=====

Count #:

*Max. Penalty:

*Max. Penalty:

Count #:

*Max. Penalty:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: LOWEN ESPINUEVA Case No.: _____

Count #: 1

18 U.S.C. § 1951(a) Hobbs Act Conspiracy

*Max. Penalty: Twenty (20) years' imprisonment and \$250,000 fine.

Count #: 2 18 U.S.C. § 1951 Attempted Hobbs Act Robbery

*Max. Penalty: Twenty (20) years' imprisonment and \$250,000 fine

Count #: 3 18 U.S.C. § 924(c)(1)(a), 2 Use of firearm during
commission of crime of violence

*Max. Penalty: Ten (10) years' imprisonment (consecutive) and
\$250,000 fine

Count #:

*Max.

*Max. Penalty:

Count #:

*Max. Penalty:

*Refers only to possible term of incarceration, does not
include possible fines, restitution, special assessments,
parole terms, or forfeitures that may be applicable.